



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 13, 2020

Rotam Limited  
c/o  
Ongongi  
Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707

Subject: Notification per PRN 98-10 – Updating storage, disposal language, and change of address  
Product Name: Emamectin Benzoate Technical  
EPA Registration Number: 81598-11  
Application Date: October 15<sup>th</sup>, 2019  
Decision Number: 557812

Dear Mr. Ogongi:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Andrés Garzón at 703-374-8547 or by email at [GarzonMoreno.Andres@epa.gov](mailto:GarzonMoreno.Andres@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Benbow".

Gene Benbow, Product Manager 7  
Invertebrate & Vertebrate Branch 3  
Registration Division (7505P)  
Office of Pesticide Programs

[\[MASTER LABEL\]](#)

# Emamectin Benzoate Technical

## An insecticide for formulating use only

**ACTIVE INGREDIENT:**

Emamectin Benzoate (CAS No. 155569-91-8) .....95.9%

**OTHER INGREDIENTS:** .....4.1%**TOTAL:** .....100.0%

EPA Reg. No.: 81598-11

EPA Est. No.:

### KEEP OUT OF REACH OF CHILDREN

### DANGER/PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand the label, find someone to explain it to you in detail.)

<b>FIRST AID</b>	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
<p><b>Probable mucosal damage may contraindicate the use of gastric lavage.</b> Early signs of intoxication include dilated pupils, muscular incoordination, and muscle tremors. If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements. In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since emamectin benzoate is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic emamectin benzoate exposure.</p>	
<b>HOTLINE NUMBERS</b>	
<p><b>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</b> For 24 Hour Medical Emergency Assistance (Human or Animal), call: <b>1-800-222-1222.</b> For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), call: CHEMTREC – <b>1-800-424-9300.</b></p>	

[SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON LABEL.](#)~~83390-CHN-001~~

**Manufactured [For] [By]:**  
Rotam Limited  
Unit 6, 26/F, Trend Centre  
29 Cheung Lee Street  
Chai Wan, Hong Kong

### NOTIFICATION

81598-11

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

01/13/2020

**Net Content:**

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### DANGER/PELIGRO

Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Harmful if absorbed through skin or inhaled. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. The following protective clothing must be worn during all handling and formulation operations: protective eyewear, long-sleeved shirt and long pants, socks, shoes, chemical-resistant gloves, and a NIOSH approved particulate respirator with any N, R, or P filter with NIOSH approval number prefix TC-84A; or a NIOSH approved powered air purifying respirator with HE filter with NIOSH approval number prefix TC-21C.

#### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, birds, mammals, and aquatic invertebrates. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans, or other public waters, unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit, and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

#### Instructions to Formulators

Formulators using this product are responsible for obtaining Environmental Protection Agency registration for their formulated products. This technical product may be used only for formulation of end-use insecticides for injection into deciduous, coniferous, and palm trees for control of certain arthropod pests.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

**Pesticide Storage:** Store in a tightly closed original container in a cool, dry place. Do not store near food or feed.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

#### Container Handling:

**[Non-refillable Plastic Containers (Capacity Equal to or Less than 50 Pounds):** Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container  $\frac{1}{4}$  full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two or more times. Offer for recycling, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]

**[Non-refillable Plastic Containers (Capacity Equal to or more than 50 Pounds):** Do not reuse or refill this container. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank. Hold container upside down over application equipment or a mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by State and local ordinances.]

**[Non-refillable Paper or Plastic Bags, Fiber Sacks including Flexible Intermediate Bulk Containers (FIBC) or Fiber Drums with Liners.** Do not reuse or refill this container. Completely empty paper or plastic bag, fiber sack or drum liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application or manufacturing equipment. Then offer for recycling if available or dispose of empty paper or plastic bag, fiber sack or fiber drum and liner in a sanitary landfill, or by incineration. Do not burn, unless allowed by State and local ordinances.]

**[Refillable Fiber Drums With Liners: Refillable container (fiber drum only). Refilling Fiber Drum:** Refill this fiber drum with Emamectin Benzoate Technical containing Emamectin Benzoate only. Do not reuse this fiber drum for any other purpose. Cleaning before refilling is the responsibility of the refiller. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application or manufacturing equipment.]

**[Disposing of Fiber Drum and/or Liner:** Do not reuse this fiber drum for any other purpose other than refilling Emamectin

Benzoate Technical. Cleaning the container (liner and/or fiber drum) before final disposal is the responsibility of the person disposing of the container. Offer the liner for recycling, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner. To clean the fiber drum before final disposal, completely empty the fiber drum by shaking and tapping sides and bottom to loosen clinging particles. Empty residual into application or manufacturing equipment. Offer for recycling, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]

**CONTAINER DISPOSAL:**

~~Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment or a mix tank. Return to point of sale or offer for recycling if available or dispose of in a sanitary landfill, or by incineration. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.~~

**EMERGENCY RESPONSE:** For 24 hour emergency information regarding spills, leaks, exposure, or accidents, call: CHEMTREC 1-800-424-9300.

**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

**NOTICE:** Read the entire Directions for Use and Conditions for Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of ROTAM LIMITED, or Seller. The Buyer and User shall assume all such risks, and Buyer and User agree to hold ROTAM LIMITED and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, ROTAM LIMITED warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to proper instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM LIMITED, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ROTAM LIMITED MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR NEITHER A PARTICULAR PURPOSE NOR ANY OTHER EXPENSES OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, ROTAM LIMITED, or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

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**Manufactured For:**  
Rotam Ltd.  
26/F, E-Trade Plaza  
24 Lee Chung Street  
Chai Wan, Hong Kong

**Product of China**